

**Stephen H. Buckley**, OSB #80178  
sbuckley@brownsteinrask.com  
**Cary R. Cadonau**, OSB #00224  
ccadonau@brownsteinrask.com  
BROWNSTEIN | RASK  
1200 S.W. Main Street  
Portland, Oregon 97205  
Telephone: (503) 221-1772  
Fax: (503) 221-1074  
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON, PORTLAND DIVISION

TRUSTEES OF THE OREGON-WASHINGTON  
CARPENTERS-EMPLOYERS HEALTH AND  
WELFARE TRUST FUND, et al.,

Civil No. 3:13-cv-935-BR

**STIPULATED JUDGMENT**

Plaintiffs,

v.

K'LEB O. SHIVVERS and BETHANY V.  
SHIVVERS, fdba K & B Interior Woodwork,

Defendants.

---

BASED UPON the parties' stipulations as evidenced by their signatures below, now  
therefore,

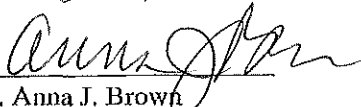
IT IS HEREBY ADJUDGED AND ORDERED AS FOLLOWS:

1. Defendants, jointly and severally, shall pay the following amounts to Plaintiffs:  
\$49,099.50 in fringe benefits contributions and union dues; \$9,087.15 in liquidated damages;  
\$38,685.09 in interest calculated through August 20, 2012, with interest continuing to accrue on

the sum of the unpaid fringe benefit contributions (\$45,435.70) at the rate of 12% per annum from August 21, 2012, through entry of judgment, and interest continuing to accrue on the unpaid union dues (\$3,663.80) at the rate of 9% per annum from August 21, 2012, through entry of judgment; \$2,354.71 in payroll examination fees; and \$1,000.00 in attorney fees and court costs.


2. Plaintiffs shall retain the right to conduct a future payroll examination of Defendants' books and records (for a time period other than July 1, 2004 through June 30, 2008) in order to ensure that all required fringe benefit contributions and union dues have been paid; and further, in the event the payroll examination reveals that delinquent fringe benefit contributions and/or dues are owed, Plaintiffs shall have the right to institute legal proceedings against Defendants to recover the delinquent fringe benefit contributions and/or union dues found due and owing pursuant to the payroll examination report, together with liquidated damages, interest, payroll examination fees, attorneys' fees and court costs.

ORDERED AND ADJUDGED this 25<sup>th</sup> day of July 2013.


  
Hon. Anna J. Brown  
U.S. District Court Judge

SO STIPULATED:

 7-19-13  
K'leb Shivers Date

 7-19-13  
Bethany Shivers Date

Brownstein | Rask

  
Cary Cadonau, OSB #00224  
Attorney for Plaintiffs